

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

_____)	CIVIL ACTION NO. 04-40092-FDS
LOUIS P. ALBERGHINI,)	
)	Jonathan R. Sigel
Plaintiff,)	BBO# 559850
)	
v.)	Marcia L. Elliott
)	BBO# 564291
SIMONDS INDUSTRIES INC.,)	
)	
Defendant.)	
_____)	

JOINT MOTION TO EXTEND SCHEDULING ORDER

The parties respectfully move this Court to extend the scheduling order in the above captioned case as follows: allow the parties to submit their respective dispositive motions on or before May 15, 2005; allow the parties to submit their respective oppositions to such motions by June 15, 2005; and schedule the pre-trial conference, if necessary, after this Court issues its decisions on the parties' dispositive motions. As grounds for their motion, the parties state as follows:

1. Under the current scheduling order, all dispositive motions must be filed by April 15, 2005.
2. Remaining depositions in this case are scheduled to take place on March 10 and March 16, 2005.
3. Counsel for the parties are now preparing for trial in Federal District Court in Boston in the case of Larsen v. Simonds Industries Inc., Civil Action No. 01-40059-NMG. That trial is scheduled to begin on March 28, 2005 and is expected to last several days.

4. Due to these matters, the parties need extra time to prepare and file their respective summary judgment motions and/or oppositions to such motions.

5. Neither this Court nor the parties will be prejudiced by the allowance of this Motion.

Therefore, the parties jointly request that the Court extend the Scheduling Order so as to allow parties to file their respective dispositive motions on or before May 15, 2005; allow the parties to submit their respective oppositions to such motions by June 15, 2005; and schedule the pre-trial conference, if necessary, after this Court issues its decisions on the parties' dispositive motions.

Respectfully submitted,



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